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February 8, 2021

VIA ECF

Honorable Arlene Lindsay, U.S.M.J.
United States District Court
Eastern District of New York
814 Federal Plaza
Central Islip, New York 11722

Re: *Ora Naftali and Roni Naftali as Trustees of the Edtom Trust dated April 10, 2011, et al.,
v. New York Deferred Exchange Corp., et al.*
U.S. District Court, Eastern District of New York Docket No. 15-cv-07152 (JMA)(BRL)

Dear Judge Lindsay:

We represent defendant/third-party plaintiff New York Deferred Exchange Corp. ("NYDEC") with respect to the above-referenced action. With the consent of all parties, we write to request that the Court amend the briefing schedule for the proposed motions for summary judgment by one week.

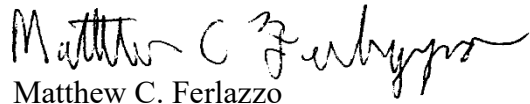
NYDEC is submitting this first request to amend the briefing schedule because of unexpected developments in other cases and in personal matters. Accordingly, there is good cause justifying the short extension of the briefing schedule. Therefore, with the consent of all parties, NYDEC respectfully requests that the Court amend the briefing schedule as follows:

- Deadline to serve motions for summary judgment moved from February 10 to February 17, 2021;
- Deadline to serve opposition moved from March 25 to April 1, 2021; and
- Deadline to serve replies and file all motion papers moved from April 18 to April 23, 2021.

We thank the Court for its consideration of this matter.

Respectfully Submitted,

HINSHAW & CULBERTSON LLP


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cc: All counsel via ECF

SO ORDERED:

Honorable Arlene R. Lindsay, U.S.M.J.